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Honorable Paul A. Crotty United States District Court Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312 United States v. Abduraman Iseni Docket No. 11 Cr 185

Dear Judge Crotty,

I am assigned counsel for Abduraman Iseni and I am making this application to supplement my November 30, 2011 letter application in which I requested that the Court make another designation recommendation for Mr. Iseni. I am also writing to request a three-month postponement of Mr. Iseni's January 3, 2012 surrender to FCI, Victorville. California, if the results of biopsies which Mr. Iseni's wife, Tueta Gerguri, will undergo on December 12th indicate further treatment is necessary.

Specifically, Mr. Isoni's wife, Teuta, is a thirty year-old a registered nurse at Marmonides Hospital in Brooklyn. As stated in her attached letter doctors at Sloan-Kettering Cancer Center have detected a suspicious mass in her breast. She will undergo a core biopsy on December 12th.

While such a preliminary diagnosis alone is traumatizing, a finding that Teuta has breast cancer would be devastating to her and Mr. Iseni. Both would have added great stress regarding how this crisis could affect the future their ten-month old daughter, Lea. Clearly, family support could be crucial in such a crisis. And, as suggested by Teuta's attached letter, the chances of success of any treatments she may receive could depend greatly on her getting total and full-time support from Mr. Iseni.

Therefore, I renew my application for an additional designation recommendation based on Mr. Iseni's deteriorating personal circumstances and request that his surrender date be postponed at least three months if Teuta's condition requires further treatment.

Respectfully submitted,

cc: Daniel Goldman, AUSA

Lawrence F. Ruggiero

Date 12/08/2011

Dear Honorable Judge:

My name is Teuta Gerguri, I'm 30 years old and I'm a nurse at Maimonides Medical Center in Brooklyn, NY. My husband's name is Abdurahman Ison and my daughter's name is Loa. I'm currently under Dr. Sacchim's care at Sloan-Kottering Cancer Denter in New York, NY.

The reason I'm writing you this letter is because, I'm currently in a great emotional distress. My doctor has recently discovered a suspicious mass on my left breast. I'm scheduled to have a core biopsy on December 12, 2012.

My husband Abdurahman Isomi is the greatest husband and father in the world. Lea adores him. He is my rock and my world. He has given me a great emotional support during this difficult time. He helps me with babysitting for my daughter Lea who is only to months old.

Please I'm begging you to extend his time when he needs to surrender himself. He will serve his jail time and I understand. But if I could have him with me during this difficult time of my life I would greatly appreciated it. Loa also would be taken a better care with him present at this time.

Please, please consider my request.

Thanks

LAWRENCE F. RUGGIERO

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November 30, 2011

Honorable Paul A. Crotty United States District Court Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

> <u>United States v. Abduraman Iseni</u> Docket No. 11 Cr 185

Dear Judge Crotty,

I am assigned counsel for Abduraman Iseni and I am writing to request that this Court make an additional designation recommendation for Mr. Iseni.

On October 24, 2011 Your Honor sentenced Mr. Iseni to 36 months imprisonment followed by 2 years supervised release. At his sentencing Mr. Iseni requested this Court's recommendation that Bureau of Prisons designate him to a nearby institution to enable his wife and 9 month old daughter to visit him. Upon granting that request and making such a recommendation this Court further ordered that Mr. Iseni surrender to the designated institution before 2 p.m. on Tuesday January 3, 2012. On November 2, 2011 the Probation Office directed Mr. Iseni to surrender to the Medium II FCI in Victorville, California on January 3, 2012 before 2 P.M.

I make this application because the substantial costs and logistical difficulties which Mrs. Iseni, a full-time employed registered nurse, would have to bear to visit Mr. Iseni with their child would result in his only rarely if ever receiving visits from them, his only family. The emotional consequences to Mr. Iseni of such an unnecessary isolation from his family will significantly and unduly increase the harshness of his sentence. They will also put unnecessary strain on his family and his relationship with them.

cc: Daniel Goldman, AUSA

Respectfully submitted,

Lawrence F. Ruggiero



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building

One Saint Andrew's Plaza New York, New York 10007

December 9, 2011

By E-Mail

The Honorable Paul A. Crotty United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

> Re: <u>United States</u> v. <u>Abduraman Iseni</u>, 11 Cr. 185 (PAC)

Dear Judge Crotty:

The Government respectfully submits this letter in response to the defendant's letters of November 30, 2011, and December 8, 2011.

As to the defendant's designation, the Government takes no position.

As to the defendant's request to adjourn his surrender date by three months, the Government respectfully submits that the request is premature and should not be decided until the results from the defendant's wife's biopsy in three days time are determined. In addition, the Government respectfully requests that the defendant provide documentation from Memorial Sloan Kettering Cancer Center regarding the defendant's wife's medical condition and the results of the biopsy. The Government can then determine its position based on that information.

Respectfully submitted,

PREET BHARARA United States Attorney

cc: Lawrence Ruggiero, Esq.

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